



Special Hearing
2/3/05

cc: BO, DI, DWQ

E-ops: BO, CC, HMS, TH, CMW

U.S. Borax Inc.
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February 3, 2005

Debbie Irvin, Clerk to the Board
Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

97. Borax

Subject: Comments to the Draft National Pollutant Discharge Elimination System (NPDES) General Permit for Industrial Storm Water Discharges, Water Quality Order No. 97-03-DWQ

Dear Ms. Irvin and Members of the Board:

US Borax Incorporated (US Borax) currently operates a manufacturing facility located at 300 Falcon Street in Wilmington, California. The facility lies within the harbor district of the Port of Los Angeles. The facility stores, manufactures, and distributes boron-based compounds used in a variety of commercial applications including insulation fiberglass, cleaning products, pharmaceuticals, fertilizers, insecticides, and wood preservatives. US Borax began operations at the site in 1928 and currently employs approximately 120 people.

Storm water discharges at the site are regulated under the General Permit for Industrial Storm Water Discharges (General Permit). The facility manages storm water runoff through a Storm Water Pollution Prevention Plan (SWPPP) and Monitoring and Reporting Plan (MRP). Source-control Best Management Practices (BMPs) have been developed and are implemented at the site, including good housekeeping, preventive maintenance, proper materials handling and storage, proper waste handling, and spill prevention and response.

Recently, US Borax obtained a copy of the proposed Draft General Permit dated December 15, 2004. In addition, we attended the public hearing in Rancho Cucamonga, California on January 31, 2005. We appreciate the opportunity to provide the following comments on this Draft General Permit as it may directly affect the operations at the US Borax Wilmington facility.

1. Proposed numeric effluent limits (benchmark values) are too stringent and may lead to site closure.

The 2004 Draft Permit proposes defacto numeric effluent limits (USEPA benchmark values) for discharges of storm water from a site. If a discharger exceeds one of these